

U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
FILED MAY 26 2016  
WILLIAM W. BLEVINS  
CLERK

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA** \* **CRIMINAL NO. 14-283**  
**VERSUS** \* **SECTION: "L" (5)**  
**CHERKISSA JACKSON** \*

\* \* \*

**FACTUAL BASIS**

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant, **CHERKISSA JACKSON**. The Defendant has agreed to plead guilty as charged in the Indictment charging her with false statements in violation of Title 18, United States Code, Section 1001(a)(2).

Hurricane Gustav hit the State of Louisiana on September 1, 2008. Napoleonville, Louisiana in Assumption Parish was among the municipalities impacted by Gustav. Napoleonville is within the Eastern District of Louisiana.

**CHERKISSA JACKSON** filed an application with the Department of Homeland Security Federal Emergency Management Agency ("FEMA") on September 3, 2008 claiming a loss for a trailer located at 3342 Back Marais Street, Napoleonville, Louisiana.

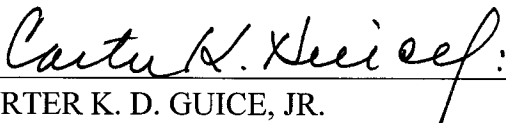
On October 31, 2008, **CHERKISSA JACKSON** received via wire transfer into her account at Teche Federal Credit Union in the amount of \$28,800 based on her claim of a loss to a trailer at 3342 Back Marais Street, Napoleonville, Louisiana.

On January 6, 2007 **CHERKISSA JACKSON** sold the trailer to another party as evidenced by a bill of sale witnessed by Brian P. Baldwin, Justice of the Peace of Napoleonville, Louisiana, and thus did not own the trailer on September 1, 2008. One must have owned the property for which the FEMA funds for Hurricane Gustav damages were sought.

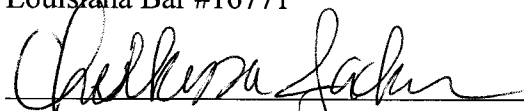
On or about February 23, 2012 in the Eastern District of Louisiana, in a matter within the jurisdiction of the Department of Homeland Security, Office of Inspector General, the defendant **CHERKISSA JACKSON** did knowingly and willfully make a material false, fictitious, and fraudulent statement and representation to a special agent of the Office of the Inspector General, Department of Homeland Security: to wit **CHERKISSA JACKSON** told the agent that she owned the trailer at 3342 Back Marais St., Napoleonville, Louisiana at the time Hurricane Gustav impacted Napoleonville, Louisiana when in truth and in fact she had sold the trailer on January 6, 2007.

The facts would have been proven with testimony of employees of the Department of Homeland Security and various financial institutions and state agencies.

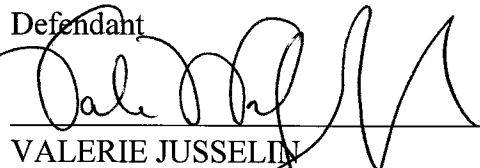
**READ AND APPROVED:**

  
CARTER K. D. GUICE, JR.  
Assistant United States Attorney  
Louisiana Bar #16771

26 MAY 2016  
DATE

  
CHERKISSA JACKSON  
Defendant

5-26-16  
DATE

  
VALERIE JUSSEIN  
Assistant Federal Public Defender  
Attorney for Defendant

5-26-16  
DATE